

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CR. NO. 1:21-CR- 257  
:   
v. :   
: (JUDGE Conner )  
STANLEY G. BOBULA, :   
:   
Defendant. :

INDICTMENT

**FILED**  
HARRISBURG, PA

SEP 01 2021

THE GRAND JURY CHARGES:

Per IBR  
Deputy Clerk

COUNT 1

18 U.S.C. § 2252(a)(4)(B)  
(Possession of Images Containing  
the Sexual Exploitation Children)

On or about January 23, 2021, in York County, within the Middle  
District of Pennsylvania, the defendant,

**STANLEY G. BOBULA,**

did knowingly possess at least one matter which contains any visual  
depiction that had been shipped and transported in and affecting interstate  
and foreign commerce, and that was produced using materials that had been  
mailed, shipped and transported in and affecting interstate and foreign  
commerce, by any means, including by computer and cellular telephone, and  
the production of such visual depiction involved the use of a minor engaging

in sexually explicit conduct, and such visual depiction was of such conduct.

It is further alleged that the conduct alleged above occurred subsequent to defendant Bobula's conviction for Transportation of Child Pornography in the United States District Court for the District of Columbia, docket number CR09-062-01, on or about February 18, 2010.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE:

**FORFEITURE ALLEGATION**

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

2. Pursuant to Title 18, United States Code, Section 2253(a), upon conviction of an offense in violation of Title 18, United States Code, Sections 2252(a)(4)(B), the defendant,

**STANLEY G. BOBULA,**

shall forfeit to the United States of America:

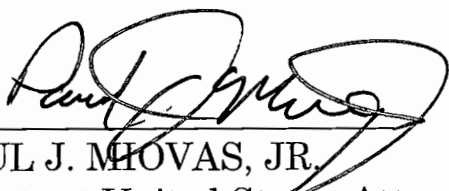
- a. A Dell Inspiron 15 Laptop (Model: P55F, Service Tag: FR9YJ52) with a Western Digital 500 GB hard drive (Model: WD5000LPLX-75ZNTT0, Serial Number: WXU1AC7A4AJH);
  - b. Any visual depiction described in Title 18, United States Code, Section 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Section 2252;
  - c. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
  - d. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.
3. If any of the property described above, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All Pursuant to Title 18, United States Code, Section 2253(a).

BRUCE BRANDLER  
ACTING UNITED STATES ATTORNEY

  
PAUL J. MOVAS, JR.  
Assistant United States Attorney

TRUE BILL



09/01/2021  
Date